

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff

Case No. 06-CR-320

v.

DAVID OLOFSON,

Defendant

NOTICE OF MOTION AND MOTION

Please take notice that the defendant, David Olofson, by Rose & Rose by Christopher W. Rose, his attorney, will move this Court for the relief requested in the annexed motion before the Honorable William E. Callahan, Jr., United States Magistrate Judge, United States District Court for the Eastern District of Wisconsin on the _____ day of _____, 2007 at _____ a.m. or as soon thereafter as counsel can be heard.

Dated this 26th day of December, 2006.

ROSE & ROSE
Attorneys for Defendant

BY: s/ CHRISTOPHER W. ROSE
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MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS

The defendant, David Olofson, by Rose & Rose, by Christopher W. Rose, his attorney, moves this Court for an order extending the deadline in which to file pretrial motions in the above matter for the following reasons:

1. That all motions, together with legal memoranda and supporting affidavits were ordered to be filed no later than 12/26/06.

2. Said deadline is set forth in a pretrial order dated December 6, 2006.

3. The undersigned Christopher W. Rose, attorney for David Olofson, did not receive the discovery in the above matter until the week of December 18, 2006, leaving very little time in which to review the discovery, as well as review said discovery with Mr. Olofson.

4. That the first meeting the undersigned had with Mr. Olofson was on Thursday, December 21, 2006. After said meeting, Mr. Olofson needed to review the discovery and possibly employ an expert witness to testify on his behalf in his case.

5. If an expert is employed by Mr. Olofson, Mr. Olofson may need to file a pretrial discovery motion to view the Olympic Arm, SGW, Model CAR-AR, Serial No. F7079.

6. Further, Mr. Olofson may also need to file a motion to appoint an expert to assist him in his case with the Court as well.

7. Further, upon reviewing the discovery in the above matter, it was determined that Attachment A to the search warrant was not forwarded by the U.S. Attorney's office. The undersigned has attempted to contact the U. S. Attorney's office on this issue but has not heard back from them.

Wherefore, for the foregoing reasons, the defendant, David Olofson, by Rose & Rose by Christopher W. Rose, his attorney, moves this Court for an order to extend the deadline to follow any and all pretrial motions in the above matter by thirty (30) days for the reasons set forth herein.

Dated this 26th day of December, 2006.

ROSE & ROSE
Attorneys for Defendant, David
Olofson

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